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CITGO Petroleum Corporation

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September 12, 2005

U.S. Environmental Protection Agency, Region 5
ATTN: Mrs. Mila V. Bensing
Emergency Enforcement & Support Section, SE-5J
77 West Jackson Boulevard
Chicago, IL 60604-3590

Re: Request for Information Pursuant to Section 104 of CERCLA
IWI Inc. Site, Summit, Illinois
CITGO Claim No. 608-SA
CITGO Matter No. A22073

Dear Mrs. Bensing:

The EPA's letters of August 18, 2005 to Cities Service Oil Company and Citgo Service Oil Co., regarding the above-referenced site, has been forwarded to me for handling. At my request, my paralegal, Peggy Landrum, contacted Mr. Jerome Kujawa on August 30, 2005 to obtain some background information and an extension to answer the request concerning the IWI site. He advised Ms. Landrum that a Mr. Glenn Wellman operated a tank and drum manufacturing and refurbishing operation (a/k/a IWI Industries, Inc.; Wellco; ITASCO and IWI) for over 40 years until his death in 1999.

Based on the EPA's information, I am writing to advise you that **CITGO Petroleum Corporation did not operate or exist as a company prior to March 18, 1983.** Before then, CITGO was principally a trade name utilized in connection with the refining, marketing, and transportation operations of Cities Service Company ("Cities"). Effective March 18, 1983, Cities assigned and transferred its refining, marketing and transportation assets to its wholly-owned subsidiary, CITGO Petroleum Corporation, which was subsequently sold to The Southland Corporation on August 31, 1983, and has subsequently been sold by The Southland Corporation to a subsidiary of Petroleos de Venezuela, S.A. CITGO has had no corporate relationship to Cities since August 31, 1983. **Cities continued as a corporation after August 31, 1983.** It is CITGO's understanding that CanadianOxy Offshore Production Company ("CanadianOxy") is now the successor-in-interest to all rights and obligations of Cities, and OXY USA Inc. has indemnity obligations to CanadianOxy in these matters and Glenn Springs Holdings, Inc. assists OXY USA in these matters.

Mila V. Bensing
September 12, 2005
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For matters relating to environmental responsibilities prior to September 1, 1983, CITGO suggests that you contact:

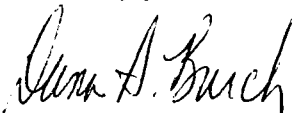
Patricia Patten, Esq.
Glenn Springs Holdings, Inc.
2480 Fortune Drive, Suite 300
Lexington, KY 40509
(859) 543-2100

CITGO makes no statement or judgment that either CanadianOxy, OXY USA Inc. or Glenn Springs Holdings, Inc., or any of their related affiliates have any responsibility concerning the IWI Inc. Superfund site.

Given the limited information that has currently been made available to CITGO Petroleum Corporation by the EPA, CITGO made an extensive search of its records for the time period September 1, 1983 until present and finds no connection with Mr. Glenn Wellman, Wellco, ITASCO, IWI, Industries, Inc. or IWI and therefore believes it has no responsibility regarding the above-referenced Superfund site. Should further information arise that might link CITGO to the above-referenced Superfund site, CITGO will be glad to review said information and provide the EPA with any relevant information.

If you have any questions regarding the above, please do not hesitate to call me at the above number or my paralegal, Peggy Landrum at (832) 486-5545.

Sincerely yours,



Dana A. Burch
Senior Counsel

DAB:ptl

xc: Patricia Patten, Esq., GSHI (via email)
Stephen Whyte, GSHI (via email)
Allen Greene

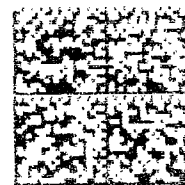


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